

A #	#	Page Number	Line, Figure, or Table No.	Commentor	Comment	T	P
42	484	3			try to use CEQA terminology at all times; consider adding columns that show mitigation, residual impacts, and responsible agency; focus on beneficial and adverse both (more balanced)		
43	485	3			in table, talk only about one alternative per column; basis of comparison should be no action except for no action that is compared to existing		
44	486	3			left column, eliminate bold titles (physical, biological, social and economic)		
45	487	3			make sure that content reflects variability within alternatives		
46	488	3			include section references under each resource in the first column so that readers are referred to more information within document		
47	489	3			summary table should highlight the differences within the resource sections; eliminate the similarities so that the differences stand out		
48	490	3			add cumulative and growth-inducing impacts to table?		
1013	491	3	Impacts	BK, EPA	Agree premature to say unmitigatable; where affordability is significant factor, could display several "what-if" scenarios that would result from various options; with various levels of cost and then model affordability using a model like the U.S. EPA MABEL model.  Characters are ok, but consider Section 2 comment re: normalization of qualitative symbol weights across resource-specific assessments		
1012	492	3	land use	BK, EPA	Consider using a land use change by option matrix like in Table 5.2-2, p. 5-6; (linked to maps), and display several "what-if" scenarios that would result from various options (say 3), with various levels of minimization/mitigation (say 3); and discuss the range of impacts, and how the program will address them. These scenarios could possibly be used with the U.S. EPA GIS-based BASINS model to predict water quality impacts.		

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500	493	3	Last Sentence	DFG	Modify last sentence to read: "Separate appendices for air quality, noise, public health and environmental hazards, transportation, and visual resources were not needed."  Add sentence: "The information provided for the affected environment describes the environmental baseline or existing condition with which the No-Project and Program alternatives will be compared."		
499	494	3	Line 6, Appendix 12	DFG	Modify to read: "The first of two ecosystem reports."		
156	495	3 -2	Table 3-1, 7 of 13	V. Pacheco, DWR	This table is confusing as descriptions for impacts to specific resources are attributed to alternatives, but are more appropriately the effect of common programs. For example, under Urban Resources: land use - Alternative One configurations are described as potentially displacing residents, etc., but only configuration three under Alternative One actually proposes any significant channel improvements or land use changes. Any significant disruption to communities may be more appropriately attributable to the common programs. Please see suggestion under comment # 2.	T	
157	496	3.1-1	Table 3.1-1, 8-of-13	R. Tom, DWR	In Table 3.1-1, water quality impacts of the different alternatives are briefly described under the environmental resource category entitled Urban Resources: Economics. Rather than describing the impacts under this category, the water quality impacts should be described in a separate category entitled Water Quality. The information which should be provided under the Urban Resources: Economics category is the economic impacts due to these water quality impacts. As much as possible, economic impact evaluations should include all costs associated with all possible measures taken to mitigate the water quality impacts. For example, economic impacts should consider all treatment costs associated with increases and/or decreases in total organic carbon and bromide concentrations in source waters as a result of the alternatives, including costs of switching to ozonation as the primary disinfection process which may required to meet new drinking water standards.	T	
155	497	3-		K. Kelly, DWR	Chapt. 3: It is not clear if alternatives 1, 2, and 3 are the IDT conveyance configurations plus all the other programs and elements or the original CALFED alternative categories.	C	

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154	498	3-	Chapter 3	Sandino, DWR	This chart perhaps could be made even more helpful. Consider adding a column of proposed mitigation measures, levels of significance after mitigation, and potential agencies responsible for implementation of mitigation measures. I know this is difficult to do in a programmatic document, but I think it should be done if possible. This information will be very helpful when you prepare CEQA findings. Some of the information in the existing columns could be made more brief. Examples: alternative 1 column for groundwater and noise refer to Alternative 1,2, and 3. The next column compares 2 to 1, etc. Why not simply state all the alternatives result in the same impacts and these impacts are not (or are) significant? Also, the detail about the impacts vary. Look at recreational resources and power columns for instance. Is there a way simply to state what the impact is (e.g., positive impact to fisheries,) rather than explaining in detail some of the impacts, but not others?	P	
701	499	3-1	Whole Chapter	WAPA	Page 5-10 (last paragraph) references Chapter 3 and states that significant impacts were to be printed in bold. No such impacts are printed in this way.		
160	500	3-1 and on	Chapter 3	Ted Sommer, DWR	This chapter is an acceptable accounting of all of the impacts. Unfortunately, there is no good synthesis of the combined impacts between all the sections--this should be the goal of any EIR. The document is comparable to a doctor running a series of tests and handing the patient copies of the lab reports, without an overall diagnosis. The patient is left without a clue whether they will need major surgery. At the very least, the document should lay out how the synthesis will be performed.	P	
702	501	3-1	Chapter 3, first paragraph, third sentence,	WAPA	The discussion (third sentence) related to the information in Table 3.1-1 does not mention whether storage is included in the impact summary, since storage can be used with all three conveyance alternatives. Discuss how storage is evaluated within the comparison of the environmental consequences summarized in Table 3.1-1.		
158	502	3-1	Table 3.1-1, 1st row	Finfrock, DWR	No summary of effects of Alt 2 & 3 on Delta hydrodynamics.	C	
159	503	3-1	Table 3.1-1, headings	Finfrock, DWR	Far right heading: change "All Alternatives" to "Alternatives 1, 2, & 3", because No Action Alternative is not included.	C	
535	504	3-1, Page 6	Table 3.1-1; Row 1	DFG	In the Alternative 3 Column add the following wording, "Reduced salinity in exported water supplies will improve agricultural production and on-farm management."		

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534	505	3-1, Page 5	Table 3.1-1; Row 1	DFG	Vegetation and Wildlife: In the All Alternatives Column add, "Construction activities associated with the Levee System Integrity would remove agricultural lands from production, while remaining lands would be afforded increased protection from flooding due to levee failure."		
532	506	3-1, Page 4	Table 3.1-1; Row 1	DFG	<p>In the Alternative 2 Column change wording to read, "Two variations of Alternative 2 are expected to have greater adverse impacts on vegetation and wildlife. Some of the impacted areas will provide additional aquatic habitat and benefit some species."</p> <p>In the Alternative 3 Column change wording to read, "One of the variations of Alternative 3 is expected to have the greatest adverse impacts on vegetation and wildlife. Some of the impacted areas will provide additional aquatic habitat and benefit some species. The other variations of Alternative 3 would have adverse impacts similar to the least damaging variations of Alternative 2".</p> <p>In the All Alternatives Column add, "Construction activities associated with the Levee System Integrity would cause significant adverse impacts on vegetation and wildlife."</p>		
816	507	3-1	Table 3.1-1, page 4 of 13	Slavin, USBOR	Water transfers could influence regional economics and should be included in the discussion.		
1029	508	3-1	Table 3.1-1	BK, EPA	consider x-ref to text for assessment of key difference among alternatives, e.g. page 1 of 13, Surface water; key difference is trade-off between Alt 2 delta water quality and Alt 3 water management flexibility; and summary chart (p 14?) of all of those x-refs, with x-ref to cumulative assessment discussion.		
767	509	3-12	3.1-1	Judy Heath, CALFED	The content of the PEIR/S does not support the finding that Alternatives 1,2,and 3 are expected to have significant adverse impacts on public health. At the most, there may be mitigatable impacts.		
705	510	3-13	Table 3.1-1	WAPA	The environmental consequences of Environmental Justice have not been summarized for any of the alternatives, as required by law. There is environmental justice information in Section 8.10 that should be summarized in this table. (Ref: Pages 8-276 to 8-279, Section 8.10.)	1.	
706	511	3-13	Table 3.1-1	WAPA	The term " <i>could adversely affect Native American resources</i> " in the summary of environmental consequences for Indian Trust Assets does not accurately portray the information in Section 8.11.2. Clarify and use consistent information and terminology.	2.	

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162	512	3-2	Table 3.1-1 Biological Environment	K. Nelson, DWR	It isn't clear how the "impacts" of each alternative are offset by the "benefits" of the ERP. Are the impacts mitigated by the ERP?	C	
161	513	3-2	Table 3.1-1, 1st row	Finrock, DWR	In the Alt. 1 description on pp 2-14, 15, there is only one mention of channel enlargement; Alt 1C, 4.9 miles of Old River. But in Table 3.1-1, Alt 1 is supposed to reduce sedimentation thru channel enlargements. What enlargements?	T	
1333	514	3-2	Table 3.1-1	P. Wisheropp: Woodward-Clyde	Terms such as "generally" are not acceptable for CEQA		

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37	515	3-2	Table 3.1-1	Steve Shaffer, CDFA	<p>Table 3.1-1 significant problems in the way agricultural impacts and benefits are described.</p> <ul style="list-style-type: none"> <li>• All common programs potentially reallocate agricultural water to other uses.</li> <li>• Geology and soils - loss of prime agricultural soils should be identified.</li> <li>• Vegetation and wildlife - significant change from agricultural crops to upland and shallow water habitat, etc.</li> <li>• Agricultural resources: land use - potential impacts from the WQ and Levees programs should be listed. Water supply impacts as viewed as part of the existing environment should also be listed.</li> <li>• Agricultural resources: economics - As with urban, water resources impacts should be listed. This is actually an environmental impact as well as an economic impact.</li> <li>• Agricultural resources: social - ERP could be inconsistent with local land use plans relative to agricultural land. WUE may have a minor beneficial impact on yields; WQ program could remove more agricultural land from production; storage and conveyance would result in loss of agricultural land, but offer the greatest potential benefit to remaining lands in terms of supply and reliability.</li> <li>• Flood control - potential major benefits from enlarged on-stream storage.</li> <li>• Power - Alt. 3 - energy costs relative to an IF? Regarding all alternatives with storage - if enlarged on-stream storage is evaluated, potential greater power production than consumption may result.</li> <li>• Visual - land use changes from agricultural to habitat may or may not be a benefit.</li> </ul> <p>There is no listing of cumulative impacts in this table, but there should be.</p>		
165	516	3-2	Table 3-1	V. Pacheco, DWR	<p>The descriptions of potential effects for alternatives and common programs are inconsistent. For example, page 4 of 13 describes effects of Levee Program on removal of agricultural land from production under Regional Economics, but is missing from page 5 of 13 under Agricultural resources: Land Use. A suggestion would be to create a database with impacts of common programs and activities for each alternative so that a consistent summary can easily be provided and updated as needed. This would also be useful for distinguishing between beneficial and adverse impacts.</p>	P	

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163	517	3-2	Table 3-1, 1 of 13	V. Pacheco, DWR	The general statement that "significant reduction in Delta water quality and supply" is inconsistent with statements in the second paragraph of section 7.1.2.4 on page 7-35. Regulatory constraints, federal and State ESA requirements, and contractual obligations would seem to maintain existing water quality conditions under the No Action Alternative.	T	
164	518	3-2	T-3.1-1	P. Wendt, DPLA (DWR)	Physical Environment: Discussion of water quality impacts/benefits between Alt. 2 and Alt 3 is confusing. Suggest adding that "Export (at CCF)" water quality improves under Alt 3, as compared to Alt.2.	T	
166	519	3-3		Lehman, DWR	Unclear to me what "adequacy" means here. <u>Increase quantity</u> seems like the right phrase.	T	
703	520	3-4	Table 3.1-1	WAPA	The description of the No Action Alternative states that conditions are forecasted to be similar to existing conditions. This differs from the information in Chapter 7, which states that the No Action Alternative will differ from existing conditions as a result of current and future restoration and enhancement programs. Reconcile these differences and use consistent information and terminology.	3.	
704	521	3-4	Table 3.1-1	WAPA	The descriptions of Alternatives 1, 2, and 3 are not accurately portrayed in comparison to the information provided in Section 6.6. The descriptions state that each alternative is " <i>expected to have significant adverse air quality effects</i> ". Yet the information provided in Section 6.6 clearly discusses that construction- and operations-related impacts are either expected not to be significant or there will be potential short-term impacts. The closest point in the Section 6.6 that can be summarized as " <i>significant adverse air quality effects</i> " are the " <i>potentially significant direct, short-term, construction-related air quality impacts</i> " associated with some, not all, configurations. Clarify the summary statements for Alternatives 1, 2, and 3 and use consistent information and terminology.	4.	
167	522	3-5	Ag Resources	Finfrock, DWR	Under No Action, what are "No Action uses"? And why would only the No Action Alternative have the possibility of land use conversions inconsistent with local and regional plans?	T	
1290	1054	7 of 13	table 3.1-1	J. Lowrie NRCS	Statement in "In alternatives column" water use efficiency program measures <u>would</u> result in increased yields for farmers, it should be noted that yield increases will vary significantly depending on a variety of environmental and management factors.		

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1176	1583	Ch 3, page 3 of 13	Table 3.1-1	FWS	Fisheries: As with several sections of the document, impacts are very difficult to follow due to an unfocused vision of the No Action Alternative. It is stated for Alternative 1 that fisheries would suffer the least impacts. However, it should be noted that many species, such as delta smelt, are unlikely to recover under either of these alternatives. There is no clear picture in the PEIS that portrays a realistic view of what No Action vs. other Alternatives really means for fisheries populations maintenance and recovery. Recommend that these parameters be more precisely tracked throughout the document.		
1175	1584	Ch 3, page 3 of 13	Table 3.1-1	FWS	Air Quality: This section indicates that significant adverse air quality effects are expected to result from construction of storage facilities. It would be helpful to note that the adverse effects to air quality would be temporary so that the EIS/EIR does not give the impression that project implementation would result in permanent degradation of air quality.		
1174	1589	Ch. 3, page 2 of 13	Table 3.1-1	FWS	Geology and Soils: "The conversion of agricultural soils for storage and conveyance facilities and levee setbacks or improvements is expected to be a significant adverse impact in the Delta Region." It is not clear why this constitutes an adverse impact to geology and soils; perhaps it would be more accurate to say that the conversion of agricultural soils for storage and conveyance facilities creates an adverse impact to agricultural economics.		



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1007	1594	Chapter 3	Table 3.1.1 page 1ff	CY, EPA	<p>1. Surface water resources, etc: Some references to water management flexibility. Where have measures of flexibility been defined?</p> <p>2. Fisheries and aquatic resources (as an example): devise a way to distinguish benefits from common program (ERPP), and adverse (or beneficial) impacts of variable elements of the alternative. (Another option: could summarize benefits of common programs separately and use a table such as 3.1.1 to refer only to additional impacts associated with variable features of alternatives.)</p> <p>3. Are there no impacts (eg, benefits for habitat) associated with the levees, or is this counted in ERPP?</p> <p>4. Agricultural resources, land use: impact entry in "no action" column makes no sense. State the types of land conversion forecast. (Elsewhere under no action there's a similar problem: "no action conditions" is not useful information. See flood control for a positive example.)</p> <p>5. Agricultural resources economics: assessment of potential benefits from WUE (which is included in text) is omitted from this summary. Benefits not limited to increased reliability due to storage.</p> <p>Generally: it would help to provide explain certain metrics referred to in the Table--for example, flexibility, reliability. There should be cross references to more detailed tables in subsequent chapters.</p>		
526	1602	Entire Table	Table 3.1-1	DFG	It is not clear if these are supposed to be generalized alternatives. Within alternatives some differences are so great that generalizations are questionable; examples are the fish entrainment impacts of Alt 2B and 2E.		
527	1636	Page 1	Table 3.1-1	DFG	Surface Water Resources: Add the following under the Alternative 3 Column, "Alternative 3 is expected to result in significant improvements in Bay-Delta Hydrodynamics compared to Existing Conditions and alternatives 1 and 2."		
528	1637	Page 1	Table 3.1-1	DFG	Surface Water Resources: This section ignores significant changes in hydraulics in the lower Sacramento River and Delta under both Alts 2 & 3. Additionally, improved water quality under Alt 2 is not dependent solely on storage facilities.		

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531	1638	Page 3	Table 3.1-1	DFG	In the Alternative 1 Column add "greatest adverse impacts and the" before the word "least" and add the word "beneficial" after the word "least". In the Alternative 2 Column delete "greatest" and instead add "greater adverse impacts and moderate beneficial" before the word "impacts". In the Alternative 3 Column delete "greater" before the word impacts and insert the following, "the greatest beneficial impacts and least adverse" before the word "impacts".		
529	1639	Page 3	Table 3.1-1	DFG	Modify the paragraph under Alternative 3 to read, "Alternative 3 is expected to have impacts slightly greater than Alternative 1 but less than Alternative 2."		
530	1640	Page 3	Table 3.1-1	DFG	Fisheries: Fish will probably be worst off with Alt 1, better off with 2 unless the upstream barrier problem proves very great, and best off with Alt 3. This table should be modified accordingly.		
533	1641	Page 9	Table 3.1-1	DFG	Recreational Opportunities: Comparison among alternatives does not make sense. Intrinsic direct effects of alternatives are probably small except for potential of recreational facilities directly incorporated in an isolated facility. Overriding recreational effect would probably be proportional to improvements in fishery resources, as described above.		

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